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Attorneys for Plaintiff and the Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BRETT MCNAMAR, individually, and
on behalf of those similarly situated,

Plaintiff,

vs.

EXPERIAN INFORMATION
SOLUTIONS, INC.,

Defendant.

Case No. 4:25-CV-04819-HSG

**JOINT STIPULATION TO EXTEND
MOTION TO DISMISS BRIEFING
DEADLINES; ORDER (as modified)**

Pursuant to Fed. R. Civ. P. 6(b) and Civil L.R. 6-2, this Stipulation is entered into between Plaintiff Brett McNamar (“Plaintiff”) and Defendant Experian Information Solutions, Inc. (“Experian”), by and through their respective counsel of record.

On November 21, 2025, Experian responded to the Court’s Order to Show Cause by, among other things, stating that it would move to dismiss the second amended complaint. *See* ECF No. 54. The OSC response stated that the parties had conferred regarding the briefing deadlines and stipulated to the following schedule:

- 1) Experian’s motion to dismiss shall be filed no later than December 5, 2025;
- 2) Plaintiff’s opposition to Experian’s motion to dismiss shall be filed no later than December 23, 2025;
- 3) Experian’s reply in support of its motion to dismiss shall be filed no later than January 9, 2026;
- 4) Experian’s motion to dismiss shall be set for hearing on January 26, 2026 at 2 p.m. PST.

ECF No. 54. On November 24, 2025, the Court ordered Experian to respond to the Complaint no later than December 5, 2025. *See* ECF No. 55. Experian did so, Experian filing its Notice of Motion and Motion to Dismiss Second Amended Complaint Pursuant to 12(B)(1) and 12(B)(6) on December 5, 2025. *See* ECF No. 56, 57. Experian noticed the motion to be heard on January 26, 2026 pursuant to the parties’ stipulation.

Upon filing, the Court docket reflected the deadlines under Civil LR. 7-3, setting Plaintiff’s opposition is due December 19, 2025, and Experian’s reply is due December 26, 2025;

Pursuant to their prior stipulation, *see* ECF No. 54, the parties agree to the following briefing extensions related to this motion to dismiss, which provides a 4-day extension for Plaintiff’s Opposition, and a 14-day extension for Defendant’s Reply:

Event	Proposed Date
Plaintiff’s Opposition	December 23, 2025
Experian’s Reply	January 9, 2026

The parties also request that the motion be heard on January 26, 2026. The requested change in the briefing deadlines is sought in good faith and not for the purposes of delay or any other improper reason, and will not alter the date of the hearing on the motion to dismiss in this matter. Good cause exists for altering the default briefing schedule and adopting the parties' proposed deadlines due to counsel's other case obligations and the holiday period.

Although this extension in and of itself does not impact the current schedule for this case, we note that the current schedule was entered for this case prior to Defendant's Motion to Dismiss.

IT IS SO STIPULATED.

Dated: December 10, 2025

Respectfully submitted,

ZIMMERMAN REED LLP

/s/ Behdad C. Sadeghi

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Attorneys for Defendant Experian Information Solutions, Inc.

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories concur in the filing of this Joint Stipulation to Extend Motion to Dismiss Briefing Deadlines.

Dated: December 10, 2025

By: /s/ Behdad C. Sadeghi
Behdad C. Sadeghi

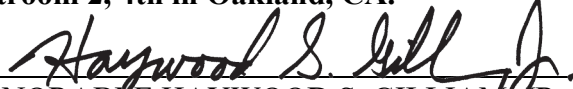
ORDER

Pursuant to the parties' stipulation under Civil L.R. 6-2, and for good cause under Fed. R. Civ. P. 6(b), IT IS HEREBY ORDERED that the following briefing deadlines shall be in effect related to Defendant's December 5 Notice of Motion and Motion to Dismiss Second Amended Complaint Pursuant to 12(B)(1) and 12(B)(6) [DKT 56]:

Event	Proposed Date
Plaintiff's Opposition	December 23, 2025
Experian's Reply	January 9, 2026

PURSUANT TO STIPULATION, IT IS SO ORDERED. The hearing on the motion will be held on January 29, 2026 at 2 p.m., in courtroom 2, 4th in Oakland, CA.

Dated: 12/10/2025


 HONORABLE HAYWOOD S. GILLIAM, JR.
 United States District Court Judge